# **LOAN-RELATED REGULATIONS**

#### **OVERVIEW**

The examination procedures in this section are not addressed under the Approved Loans or Advertising and Public Notices sections of this manual. These procedures should be conducted to ensure compliance with all sections of the subject regulations.

#### **In This Section**

ТОРІС	SEE PAGE:
TRUTH IN LENDING (TIL)	C-2
REAL ESTATE SETTLEMENT PROCEDURES ACT (RESPA)	C-3
FAIR HOUSING	C-5
HOME MORTGAGE DISCLOSURE ACT (HMDA)	C-6
EQUAL CREDIT OPPORTUNITY ACT (ECOA)	C-9
CREDIT PRACTICES RULE	C-11
FAIR CREDIT REPORTING ACT (FCRA)	C-13
WORKPAPER STANDARDS	C-16
REFERENCES	C-17

# TRUTH IN LENDING (TIL)

#### Truth In Lending (TIL)

1. Review blank copies of forms that the institution uses when extending consumer credit for the following:

Itemization of amount financed is separate from the other disclosures

"Finance charge" and "annual percentage rate" are more conspicuous than any other disclosure, except the creditor's identity

(226.17(a)(1) and 226.17(a)(2))

2. If credit balances are created in consumer accounts, determine that:

The proper amounts are credited to the accounts

The amounts are refunded upon receipt of a written request

A good faith effort is made to refund the amounts after six months without any request

(226.21)

3. Determine that evidence of compliance with Regulation Z is retained for two years after the disclosures were required to be made or other action was required to be taken. (226.25(a))

### REAL ESTATE SETTLEMENT PROCEDURES ACT (RESPA)

#### **Real Estate Settlement Procedures Act (RESPA)**

- 1. If the financial institution conducts settlement, determine if the borrower, upon request, is allowed to inspect the HUD-1 or HUD-1A at least one business day prior to settlement. (3500.10(a))
- 2. Determine whether HUD-1 and HUD-1A forms are retained for five years after settlement.

NOTE: If the financial institution subsequently disposes of its interest in the mortgage, and does not service the loan, the HUD-1 or HUD-1A must be transferred with the loan file.

(3500.10(e))

- 3. Through a review of late notices or otherwise, determine that no late fees have been imposed, and that no payments have been treated as late within 60 days following a transfer of servicing. (3500.21(d)(5))
- 4. Determine that the financial institution, as loan servicer for mortgage loans and refinancings subject to RESPA, responds to borrower inquiries as prescribed in the regulation, as follows:

Provides the notice of receipt of inquiry for qualified written correspondence from borrowers within 20 business days (unless the action requested is taken within that period, and the borrower is notified in writing of that action) (3500.21(e)(1))

Provides written notification of the corrections taken on the account, or statement of the reasons the account is correct, or explanation why the information requested is unavailable not later than 60 business days after receipt of the qualified written correspondence from the borrower (3500.21(e)(3))

Determines that the financial institution does not provide information to any consumer reporting agency regarding overdue payment when investigating a qualified written request from a borrower regarding disputed payments during this 60 business day period (3500.21(e)(4)(i))

# REAL ESTATE SETTLEMENT PROCEDURES ACT (RESPA) (cont'd)

- 5. Determine whether the financial institution or service provider, charges a fee specifically for preparing and distributing the HUD-1 or HUD-1A forms, escrow statements, or documents required under the TILA. If such a fee is charged, it will be deemed a violation. (3500.12)
- 6. Determine if management is aware of the prohibitions against payment or receipt of kickbacks and unearned fees for settlements services. (3500.14)

NOTE: For further guidance on receipt of fees, see Regional Manager memorandum dated December 19, 1995, "Mortgage Referral Programs and Section 8 of the Real Estate Settlement Procedures Act (RESPA)".

7. Through interviews with financial institution management and staff, loan file reviews, and reviews of good faith estimates and HUD-1 and HUD-1A forms, determine if "federally-related mortgage loan transactions" are referred by brokers, affiliates, or other parties. Identify those parties, if present. Also, identify persons or entities to which the financial institution refers services in connection with a "federally-related mortgage transaction". (3500.14)

Identify the types of services rendered by the broker, affiliate, or service provider

Review of the financial institution's general ledger or otherwise, to determine if fees were paid to the financial institution or any parties identified

Confirm that any fees paid to the broker, affiliate (or affiliate's employees), service provider, or other party meet the requirements of Section 3500.14(g), and are for goods or facilities actually furnished or services actually performed

Where a borrower has paid for a computer loan origination (CLO), confirm that the CLO disclosure, as set forth in Appendix E of RESPA, has been provided to the borrower

8. When the financial institution owns the property being sold, determine whether it requires or gives the impression that title insurance is required from a particular company as a condition of the sale. (3500.16)

#### Real Estate Settlement Procedures Act (RESPA)

9. If the financial institution is the servicer for escrow accounts, determine if records for escrow accounts are maintained for at least five years after the servicer last serviced the escrow account. (3500.17(1)(2))

#### **FAIR HOUSING**

#### **Fair Housing**

- 1. Determine that records of monitoring information have been maintained for not less than 25 months after the financial institution notifies an applicant of action taken. This requirement also applies to records of home purchase loans which are originated by the financial institution and subsequently sold. (338.7(c))
- 2. Determine whether complete accurate information is recorded on the current calendar year loan application register (LAR) within 30 calendar days of the final disposition of applications. (338.8)
- 3. Review adverse action notices to make sure applicable loan denials, withdrawals, etc. were recorded on the LAR within 30 days of disposition of the loan applications for the current year and previously submitted LARs. (338.8)
- 4. Determine, through interviews with financial institution's staff and review of the loan files, whether the institution:

Refers any applicants to a controlled entity

Purchases any home loans originated by the controlled entity as a condition to transacting any business with the controlled entity

If this arrangement exists, the financial institution is required to enter into a written agreement with that entity.

The written agreement shall provide that the entity will:

Comply with Sections 338.3, 338.4, and 338.7, and if otherwise subject to Regulation C – Home Mortgage Disclosure, Section 338.8 (338.9(a))

Provide its books and records for examination by the FDIC (338.9(b))

Comply with all instructions and orders issued by the FDIC with respect to its home loan practices (338.9(b))

5. Follow Fair Lending procedures to review loan files for any indications of discrimination.

# HOME MORTGAGE DISCLOSURE ACT (HMDA)

#### **Home Mortgage Disclosure Act (HMDA)**

1. Determine whether the financial institution (and, if applicable, its majority-owned mortgage lending subsidiary) is subject to HMDA (Regulation C) by the following criteria:

The financial institution has a home or branch office in a metropolitan statistical area (MSA)

The financial institution had \$10 million in assets as of December 31, of the previous year

The financial institution originated at least one first-lien home purchase loan (other than temporary financing such as a construction loan), on a one-to-four family dwelling in the previous calendar year

NOTE: Originations include a refinancing of a home purchase loan.

A for-profit mortgage lending institution (other than a bank or savings association) originated home purchase loans (including refinancings of home purchase loans) equal to or exceeding ten percent of its loan origination volume (dollars) in the preceding calendar year (203.2(e)(2))

The financial institution may be exempt from Regulation C requirements because of a similar state law. (203.3(b))

NOTE: When determining whether a financial institution is subject to HMDA, the examiner should remain cognizant of any counties which may have been added or deleted from an MSA, thus causing a financial institution to become a new HMDA reporter or no longer a HMDA reporter.

Refer to the FFIEC's booklet "A Guide to HMDA Reporting, Getting It Right!" This can be a source of reference, as it lists counties in an MSA by state.

# HOME MORTGAGE DISCLOSURE ACT (HMDA) (cont'd)

If the financial institution is subject to Regulation C based on the above criteria, perform the following procedures.

1. Determine whether the financial institution makes its LAR available to the public after modifying it in accordance with Regulation C's Appendix A. The modified register (application or loan number, date application received, and date action taken excluded from the data) will be made available following the calendar year for which the data is compiled, by March 31 for a request received on or before March 1, and within 30 days for a request received after March 1. (203.5(c))

NOTE: The disclosure statement at a branch office need only contain data relating to properties in the MSA where the branch office is located.

- 2. Determine whether the modified register is available to the public for a period of three years and the FFIEC HMDA Disclosure Statement is available for a period of five years. (203.5(d))
- 3. Determine whether the public is allowed to inspect and copy the above data during the hours the office is normally open to the public for business. If a fee is charged to obtain a copy, ensure it is reasonable based on cost incurred to provide or reproduce the data. (203.5(d))
- 4. Determine if the financial institution submitted a copy of its completed LAR to the appropriate supervisory agency no later than March 1 following the calendar year for which the data is compiled. (203.5(a))
- 5. Determine that financial institutions with more than 100 entries on the LAR submit the data in an automated, machine-readable form for the 1995 data collection year. All HMDA-covered institutions, except those whose LARs contain 25 or fewer line entries, must submit data in machine-readable form with data due March 1, 1997. For financial institutions with 25 or fewer entries, the report may be in paper form. The report must be in the format of the HMDA LAR, typed or computer printed, and two copies submitted. (Regulation C, Appendix A, Section II, Paragraph A)
- 6. Determine whether an officer of the financial institution signed the HMDA LAR transmittal sheet certifying the accuracy of the data contained in the register. (Regulation C, Appendix A, Section III, Paragraph B)

# HOME MORTGAGE DISCLOSURE ACT (HMDA) (cont'd)

7. Entries from the most recently submitted LAR should be reviewed for accuracy, in conjunction with reviews of the Applications Not Originated and the Approved Loan section of this Manual.

The current calendar year LAR should also be reviewed to ensure time requirements for recording entries have been met. (Current calendar year LAR recording errors may also be violations of Section 338.8 of Fair Housing)

When conducting the review of the LAR for accuracy, the examiner should review each line and column, for accuracy. Errors in the following data columns would significantly affect the decision of whether to require resubmission:

- -- Race
- -- Sex
- -- Income
- -- Type of action taken
- -- Census tract

Therefore, these areas should be closely reviewed.

- 8. In reviewing adverse action notices ensure that applicable real estate denials, withdrawals, etc. were recorded on the LAR within 30 days after the end of the calendar quarter in which final action is taken. (203.4)
- 9. Determine whether there are errors or omissions in the HMDA LAR, modified HMDA LAR, or the FFIEC HMDA Disclosure Statement.

If errors or omissions are identified, then:

Determine that any significant errors have been corrected in the financial institution's records and resubmitted to the FFIEC

Determine that adequate notation of errors and omissions has been made on all records currently available to the public

Ensure that internal control procedures or other areas responsible for the errors and omissions have been revised and corrected to prevent recurrence

Ensure that all HMDA-related loan, denial, and withdrawn files for the past 1-3 years are reviewed by the financial institution in order to correct HMDA LAR data identified as significantly inaccurate during the examination

# HOME MORTGAGE DISCLOSURE ACT (HMDA) (cont'd)

10. Civil money penalties (CMP) may be assessed for substantial HMDA violations for either Total Data Errors or Key Column Errors. For reference on how to calculate these errors and determine whether a recommendation for civil money penalties (CMP) should be made, refer to Assessment of Civil Money Penalties, Transmittal No. DCA-96-008, dated March 11, 1996.

### EQUAL CREDIT OPPORTUNITY ACT (ECOA)

#### **Equal Credit Opportunity (ECOA)**

- 1. Review all blank loan application forms, credit scoring sheets, financial statement forms, and any other forms used to obtain borrower information. Ensure that prohibited items of information are not requested and that any request for "other income" is properly qualified. (202.5)
- 2. Determine that the following time frames are adhered to with respect to notifying applicants in writing of action taken:
  - 30 days after receiving a completed application concerning the creditor's approval of, counteroffer to, or adverse action on the application
  - 30 days after taking adverse action on an incomplete application, unless notice of incompleteness is provided
  - 30 days after taking adverse action on an existing account
  - 90 days after notifying the applicant of a counteroffer if the applicant does not expressly accept or use the credit offered

(202.9(a)(1))

3. Determine that written notifications of action taken on applications contain:

A statement of the action taken

The name and address of the creditor

A statement of the provisions of Section 701(a) of the Equal Credit Opportunity Act (the "ECOA NOTICE") (202.9(b)(1))

# EQUAL CREDIT OPPORTUNITY ACT (ECOA) (cont'd)

The name and address of the appropriate Regional Office of the FDIC

Either of the following:

- (a) A statement of specific reasons for the action taken; or
- (b) A disclosure of the applicant's right to a statement of specific reasons within 30 days, if the statement is requested within 60 days of the creditor's notification. The disclosure shall include the name, address, and telephone number of the person or office from which the statement of reasons can be obtained. If reasons are provided orally, the creditor shall also disclose the applicant's right to have them confirmed in writing within 30 days of receiving a written request for confirmation from the applicant.

(202.9(a)(2))

4. Determine, that for a business that had gross revenues of \$1,000,000 or less, in its preceding fiscal year, the procedures addressed above are followed, except that:

The statement of the action taken may be given orally or in writing, when adverse action is taken

The disclosure of an applicant's right to a statement of reasons may be given at the time of application, instead of when adverse action is taken, provided the disclosure is in a form the applicant may retain and contains the information referencing the consumer's right to a statement of specific reasons and the ECOA notice

(202.9(a)(3))

5. Determine, that for a business that had gross revenues in excess of \$1,000,000 in its preceding fiscal year, the applicant is notified (orally or in writing) within a reasonable time of the action taken, and is provided a written statement of the reasons for adverse action and the ECOA notice, if the applicant makes a written request for the reasons within 60 days of being notified of adverse action. (202.9(a)(3))

# EQUAL CREDIT OPPORTUNITY ACT (ECOA) (cont'd)

- 6. If the financial institution furnishes credit information to other parties, determine that such information is properly reported for joint accounts held by married persons. If the financial institution furnishes credit information to a consumer reporting agency, determine that the information on joint credit is furnished in a manner that will enable the agency to provide access to the information in the name of each spouse.

  (202.10)
- 7. Determine whether required records, as described in Section 202.12(b) of the regulation, are maintained for 25 months (12 months for business credit).
- 8. Follow Fair Lending procedures to review loan files for any indication of unlawful discrimination.

# CREDIT PRACTICES RULE

#### **Credit Practices Rule**

1. Obtain and review blank notes (contracts) and disclosures, including those furnished to dealers, used by the financial institution in extending consumer credit for the following prohibited contract provisions:

Confession of judgment – a waiver of the right to a notice and the opportunity to be heard in the event of a suit on the obligation (227.13(a))

Waiver of statutory property exemption – a provision that waives the consumer's statutory right to protect his or her home (known as the homestead exemption), possessions, or wages from seizure to satisfy a judgment unless the waiver is given on property that will serve as security for the obligation (227.13(b))

Assignment of wages – a provision that gives the financial institution the right to receive the consumer's wages or earnings directly from the consumer's employer if:

- -- It is revocable at will by the consumer
- -- It is a payroll deduction plan or preauthorized payment plan (whether or not revocable by the consumer), commencing at consummation, for the purpose of making loan payments

# CREDIT PRACTICES RULE (cont'd)

-- It applies only to wages or earnings already earned at the time of the assignment

(227.13(c))

Nonpossessory Security Interest in Household Goods – a provision which allows the financial institution to hold as collateral the clothing, furniture, appliances, and the personal effects of the consumer or the consumer's dependents (227.13(d))

2. Determine through discussion with financial institution management and staff if the financial institution attempts to enforce confessions of judgment, assignments of wages, security interests in household goods, or waivers of exemption in originated or acquired consumer contracts.

(227.13)

- 3. Review the financial institution's collection policies, procedures, and practices to ensure that staff members are not using an assignment of wages except where permissible. (227.13(c))
- 4. Review past due loans to determine if the financial institution collects or attempts to collect overdue payments through assignments of wages. (227.13(c))
- 5. Review past due loans to determine if the financial institution collects, or attempts to collect, a late charge on a timely payment because of the consumer's failure to pay a late charge attributable to a prior delinquent payment. This prohibited practice is known as pyramiding of late charges. (227.15)
- 6. Determine, through a review of procedures, policies, and practices, whether the financial institution takes steps to prevent its staff from engaging in prohibited co-signer practices on loans. (227.14(a))
- 7. Determine through discussions with financial institution management and staff, if there is evidence that the financial institution engages in prohibited co-signer practices.

Examples include misrepresentation of a co-signer's liability and contractually obligating co-signers prior to informing them of their liability. (227.14(a))

### CREDIT PRACTICES RULE (cont'd)

- 8. Determine through discussions with financial institution management and staff and a review of loan files, whether the co-signer is informed prior to becoming obligated, of the nature and extent of the co-signer's liability in accordance with Section 227.14(a).
- 9. Determine through a review of loan files that the co-signer is given a written notice, substantially similar to that found in Section 227.14(b)(1), describing his potential liability prior to becoming obligated on the contract.

#### FAIR CREDIT REPORTING ACT (FCRA)

#### **Consumer Report User**

#### **Fair Credit Reporting**

- 1. Review rejected loan files (credit applications).
- 2. Determine whether the financial institution uses credit bureau reports, or other outside information, in evaluating credit applications. If so, determine whether the financial institution as a user, makes the following required disclosures:

If the credit is for personal, family, or household purposes, and the credit is denied or the charge for such credit is increased, either wholly or partly because of information contained in a consumer report from a consumer reporting agency, the user of the consumer report advises the consumer of the following:

- -- The information obtained from the credit reporting agency contributed to the increased cost or denial of credit
- -- The name and address of the consumer reporting agency (615(a))

If the credit is for personal, family, or household purposes, and the consumer is denied or the charge for such credit is increased, either wholly or partly because of information obtained from a person other than a consumer reporting agency, the user of the information will clearly and accurately disclose the following information:

# FAIR CREDIT REPORTING ACT (FCRA) (cont'd)

- At the time the adverse action is made, the right of the consumer to make a written request within 60 days after learning of the adverse action for the user of the report to disclose the nature of the information used in denying or increasing the cost of their credit
- -- Within a reasonable period of time after receiving a timely written request from a consumer, the user will provide the consumer the nature of the information used to deny or increase the cost of credit

(615(b))

3. Review any written contracts between the financial institution and credit reporting agencies. Ensure the financial institution has certified that the purposes for which information from a credit report is sought are for purposes allowed under Section 604, and certified that the information will be used for no other purpose. (607)

#### Consumer Reporting Agency

- 4. Determine if the financial institution is a consumer reporting agency.
- 5. If so, conduct the following procedures:

Determine whether the following required disclosures are clearly and accurately provided upon request, and proper identification, by the consumer:

The nature and substance of all information (except medical information) in its files on the consumer at the time of the request

The sources of the information **except** the sources acquired solely for use in preparing an investigative consumer report and actually used for no other purpose need not be disclosed, **provided** that in the event an action is brought under the FCRA, such sources will be available to the plaintiff under appropriate discovery procedures in the court in which the action is brought

The recipients of any consumer report on the consumer which it has furnished for:

- -- Employment purposes within the two-year period preceding the request, and
- -- Any other purpose within the six-month period preceding the request

### FAIR CREDIT REPORTING ACT (FCRA) (cont'd)

#### Consumer Reporting Agency (cont'd)

The dates, original payees, and amounts of any checks upon which is based any adverse characterization of the consumer, included in the file at the time of the disclosure

(609)

5. Determine that consumer reports were furnished under the following circumstances and no other:

In response to the order of a court having jurisdiction to issue such an order, or a subpoena issued in connection with proceedings before a Federal Grand Jury

In accordance with the written instructions of the consumer to whom it relates

To a person that the consumer reporting agency has reason to believe intends to do the following:

- -- Use the information in connection with a credit transaction involving the consumer on whom the information is to be furnished and involving the extension of credit to, or review or collection of an account of the consumer
- -- Use the information for employment purposes
- -- Use the information in connection with the underwriting of insurance involving the consumer
- Use the information in connection with a determination of the consumer's eligibility for a license or other benefit granted by a governmental instrumentality required by law to consider an applicant's financial responsibility or status
- -- Use the information in connection with a business transaction involving the consumer

(604)

- 7. Determine that obsolete information is not reported, as described under Section 605.
- 8. Determine if information has been reported to a governmental agency for reasons other than allowed in Section 604, that the information was limited to the consumer's name, address, former addresses, places of employment, or former places of employment, to a governmental agency. (608)

### FAIR CREDIT REPORTING ACT (FCRA) (cont'd)

#### Consumer Reporting Agency (cont'd)

- 9. Determine that reasonable procedures are designed to avoid violations of Sections 604 and 605, and to assure maximum possible accuracy of the information concerning the individual about whom the report relates. (607)
- 10. Review any accuracy disputes to ensure they are handled in accordance with procedures outlined in Section 611.
- 11. Ensure personnel are adequately trained in the furnishing of information. (610(c))
- 12. Determine that any charges made to a consumer for obtaining information in accordance with Section 609 are in compliance with instructions set forth in Section 612.
- 13. Determine that procedures are designed to adequately provide public record information for employment purposes in accordance with Section 613.
- 14. Determine that when an investigative consumer report is prepared, no adverse information in the consumer report (other than that which is public record) is included in a subsequent consumer report. An exception to this rule is when such adverse information has been verified in the process of making the consumer report, or the adverse information was received within the three-month period preceding the date the subsequent report is furnished. (614)
- 15. Determine if any investigative consumer reports have been prepared and whether the reports are in compliance with procedures set forth in Section 606.

#### WORKPAPER STANDARDS

Standardized workpapers must be completed when reviewing compliance with loan-related regulations. Refer to the Standardized Workpapers Appendix in this manual.



### FDIC LAW, REGULATIONS , & RELATED ACTS

#### **Applicable Rules**

Equal Credit Opportunity Act, Volume 2, Page 6610

Fair Credit Reporting Act, Volume 2, Page 6601

Fair Housing Regulations, Volume 3, Page 9633

Federal Reserve Board's Regulation B Official Staff Interpretations, Volume 2, Page 7241

Federal Trade Commission Regulations: Statement of General Policy or Interpretation of the Fair Credit Reporting Act, Volume 2, Page 7179

Home Mortgage Disclosure Act, Volume 3, Page 8687

Part 338 – Fair Housing, Volume 1, Page 2647

Part 3500 – HUD's Regulation X, Volume 3, Page 8891

Real Estate Settlement Procedures Act of 1974, Volume 3, Page 8855

Real Estate Settlement Procedures Interpretive Ruling, Volume 3, Page 8963

Regulation AA – Unfair or Deceptive Acts or Practices, Volume 3, Page 7869

Regulation B – Equal Credit Opportunity, Volume 2, Page 7209

Regulation C – Home Mortgage Disclosure, Volume 3, Page 7553

Regulation Z – Truth In Lending, Volume 2, Page 6641

Staff Guidelines on the Credit Practices Rule, Volume 3, Page 7875

Truth In Lending Act, Volume 2, Page 6565

Truth In Lending Official Staff Commentary, Volume 2, Page 6871



Disclosure Requirements Upon Renegotiation of Fixed-Rate Mortgages, Letter #87-31, Volume 1, Page 4272, dated 11/5/87

# FDIC LAW, REGULATIONS , & RELATED ACTS (cont'd)

Questions Concerning FDIC Enforcement of the Equal Credit Opportunity Act, Letter #87-39, Volume 1, Page 4279, dated 11/24/87

# **Advisory Opinions**

# Statements of Policy

Equal Credit Opportunity and Fair Housing Acts Enforcement Policy Statement, Volume 2, Page 5221

FFIEC Statement on the Home Mortgage Disclosure Act, Volume 2, Page 5303

#### DCA MEMORANDA

Assessment of Civil Money Penalties, Transmittal No. DCA-96-008, dated 3/11/96

Examination Procedures for Advertisements and Public Notices, Transmittal #DCA-96-022, dated 2/22/96

Examination Procedures for Loan-Related Regulations, Transmittal #DCA-96-006, dated 1/19/96

General Workpaper Standards and Standardized Workpapaers, Transmittal #DCA-96-003, dated 1/19/96

Pre-Examination Planning (PEP) Procedures, Transmittal No. DCA-96-013, dated 1/31/96

Revisions to Official Commentary Reg B – ECOA, Transmittal #95-018, dated 6/15/95

Summary of Amendments to RESPA, Transmittal #95-004, dated 2/17/95



# FINANCIAL INSTITUTION LETTERS (FIL)

Equal Credit Opportunity: Appraisals and Enforcement, Letter #12-94, dated 2/28/94

Fair Credit Reporting Act: Policy Statement on Prescreening by Financial Institutions, Letter #62-91, dated 12/13/91

HMDA – Amendments to Regulation C, Letter 22-93, dated 3/26/93

HMDA Data Required for Calendar Year 1995, Letter #2-95, dated 1/9/95

HMDA Data Required for Calendar Year 1996, Letter #2-96, dated 1/10/96

HMDA: Requirements Regarding Nondepository Mortgage Lenders and Applications Received Through Loan Brokers or Correspondents; Designations of Metropolitan Statistical Areas for 1994, Letter #69-93, dated 9/30/93

Home Mortgage Disclosure Act: "A Guide to HMDA Reporting" And Lobby Poster, Letter #34-95, dated 5/4/95

Home Mortgage Disclosure Act: A Guide to HMDA Reporting – Getting it Right, Letter #22-96, dated 4/15/96

Home Mortgage Disclosure Act – Federal Reserve Board Amendments to Required Annual Reports of Lending Activity, Letter #84-94, dated 12/28/94

New FDIC Guide to Compliance with the Fair Housing Act, Equal Credit Opportunity Act, Letter #47-94, dated 7/7/94

New Staff Commentary on HMDA Reporting Requirements, Letter #6-96, dated 2/13/96

Pamphlet on Home Mortgage Lending and Equal Treatment, Letter #19-93, dated 3/16/92

Revised Guide to HMDA Reporting,"Other Resources to Assist in Completing Requirements for Calendar Year 1994, Letter #51-94, dated 7/18/94

Revisions to Guidance on Fair Housing Rules (Part 338), Letter #23-92, dated 3/20/92

#### OTHER

A Guide to HMDA Reporting, Getting It Right! Interim Edition with Revised MSA, State, & County Codes (Effective January 1, 1995)